

4

Export Certification
Manual

Steps to Certify

Take Action on Common Import Requirements

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Introduction

Once the import requirements have been identified you must determine whether the commodity has or can meet the import requirements.

This section presents a review of the most common import requirements and the action(s) that need to be taken in order to meet the requirement.

The remainder of this section provides detailed information about each import requirement along with the correct action to take. [Table 4-4-1 on page 4-4-2](#) summarizes the most common import requirements in order of most to least restrictive. If you are using the electronic form of the manual you can click on the hypertext link to go directly to the information you need.

Once the required actions have been identified and met **OR** the commodity does not need to meet any of the requirements in [Table 4-4-1 on page 4-4-2](#), go to [Follow Inspection Guidelines on page 4-5-1](#).

TABLE 4-4-1: Summary of Common Import Requirements

1. Is the Commodity Prohibited?
2. Is Import Permit Necessary or Did Exporter Present One?
3. Does Commodity Have to be Free of Specific Pests?
4. Does the Commodity Have to Originate from an “Area” or “Production Area” Free from a Pest or Pathogen?
5. Does the Commodity Require a Growing Season Inspection?
6. Is There a Specific Time Period When the Commodity Is Permitted to Enter the Importing Country?
7. Does the Commodity Require Treatment or Was a Treatment Conducted?
8. Is an Official Verification or Additional Declaration Required?
9. Does the Foreign Country Limit the Import of the Commodity to Specified Ports?

1. Is the Commodity Prohibited?

Prohibited commodities cannot be certified unless an Import Permit or other form of official communication from the National Plant Protection Organization (NPPO) of the importing country is presented by the exporter. Refer to [Table 4-4-2 on page 4-4-2](#)

The action to take when a commodity is prohibited pertains to any commodity that is prohibited, regardless of whether it is processed or unprocessed.



Important

Do not certify a prohibited commodity with any type of certificate (PPQ 577, PPQ 578, PPQ 579) unless the exporter presents official communication from the NPPO allowing entry of the commodity.

TABLE 4-4-2: Action to Take on Prohibited Commodities

If the exporter has:	Then:
No import permit or other official communication	1. REFUSE to issue any certificate 2. INFORM the exporter that the commodity is prohibited by the importing country and must have an import permit to be certified.
An import permit or other official communication was presented ¹	Go to 2. Is Import Permit Necessary or Did Exporter Present One? page 4-4-2

¹ For a discussion on Import Permits refer to [Types of Official Communication](#) on [page 3-3-1](#)

2. Is Import Permit Necessary or Did Exporter Present One?

Import Permits may be:

- ◆ Required by the importing country but not necessary in order to provide phytosanitary certification in the U.S. If the exporter does not present an IP under these circumstances, do not refuse to issue a PC but caution the exporter that all phytosanitary requirements may not be met and the consignment may be rejected.
- ◆ Mandatory; phytosanitary certification cannot be provided unless one is presented by the exporter
- ◆ Presented by an exporter although not required nor mandatory. Once an exporter has presented an IP the consignment must meet the conditions stipulated on the IP and you cannot use an additional declaration stating, "Import Permit not presented."

For additional information on IPs refer to **Types of Official Communication** on page 3-3-1.

Regardless of whether an IP is required, mandatory or the exporter presents an IP when not required begin at **Table 4-4-3 on page 4-4-4**.



If an exporter presents an IP:

- ◆ Require exporter to provide translation if not in English. There should be a statement by the exporter as to who provided the translation.
- ◆ If the IP was written in a foreign language and the exporter presents a translation, the foreign language IP and the translated IP are needed for supporting documentation.
- ◆ Verify the validity of the document. Refer to **Verifying the Validity of Documentation** on page 3-3-3 for additional information.
- ◆ Follow the directions in **Table 4-4-3 on page 4-4-4**.



Exporters may present a commercial contract that specifies the phytosanitary requirements when the importer is a government agency. ACOs must verify that the importer is a government agency. If there are any doubts that the requirements in a commercial contract should be followed by the ACO, contact Export Services.

TABLE 4-4-3: Action to Take when an IP Needs to be Considered

If the exporter:	And:	Then:
Has a copy of a valid import permit		<ol style="list-style-type: none"> 1. REVIEW the IP to identify phytosanitary import requirements 2. RECORD an additional declaration (AD) that states: "Import permit <i>[number on the import permit]</i> was presented." 3. REVIEW export summary for requirements that may not be listed on IP. <div>  <p>Important</p> <p>Once an import permit is presented, do not include an AD stating, "No import permit was presented." Doing so would constitute a fraudulent statement.</p> </div>
Does not have a copy of a valid import permit	IP is not mandatory	<ol style="list-style-type: none"> 1. DO NOT refuse to issue a PC (see Important Note below) 2. INFORM the exporter that failure to provide an IP may result in the consignment not meeting the country's requirements and may be rejected 3. RECORD an AD that states: "No import permit was presented."
	IP is mandatory	REFUSE to issue any certificate



ACOs **cannot** refuse to issue a PC if an import permit is **not** presented, unless the commodity is prohibited or the IP is mandatory.

3. Does Commodity Have to be Free of Specific Pests?

EXAMPLE

Phytosanitary Certificate (PC) is required. Must be free from *Ascochyta rabiei*, **Megaselia arietina*, and *Trogoderma* spp.

If a commodity must be free of specific pests ACOs must determine:

- ◆ Status of the pest in the U.S. (NOTE: The information in the Product Requirements section of EXCERPT is based on Export Services' determination of the status of the pest in the U.S.)
- ◆ Method to determine that commodity is free of the pests that occur in the U.S. If a country does not specify the procedure to use to determine if a commodity is free of a specific pest ACOs must determine what method to use. The method must be based on the specific pest's biology and the host. Some of the common methods to determine the presence or absence of a pest are:
 - ❖ Visual inspection
 - ❖ Field inspection during growth
 - ❖ Laboratory tests

The following resources may be used to determine the status of a pest in the U.S. and the procedure for ensuring a commodity is free of a specific pest:

- ◆ EXCERPT: search EXCERPT using the *Keyword Search of Export Summaries*.
- ◆ Area identifiers, PPQ
- ◆ Crop Protection Compendium (CABI) at:

<http://www.cabi.org/compendia/cpc/>

If you do not have the user name and password contact your Export Certification Specialist. It is important to understand that the information in CABI is based on voluntary reports; if CABI does not list a pest as occurring in the U.S. it may mean that no one has sent a report to CABI.

- ◆ Export Certification Specialists (ECS)
- ◆ National Agricultural Pest Information System (NAPIS): for pests listed in EXCERPT and pests listed in NAPIS, EXCERPT will provide a direct link to the appropriate information. The absence of data on a particular pest is only an indication that a state or states have not sent in a report on the pest.
- ◆ State or county regulatory personnel


- ◆ Biological and Technical Services, PPQ - Riverdale through your ECS
- ◆ Cooperative Extension Services
- ◆ Universities
- ◆ The Widely Prevalent Plant Pathogenic Organisms Website is now available. The direct link is located at: <http://www.aphis.usda.gov/ppq/permits/plantpest/wpp/index.html>

This site can also be accessed from the PPQ Home Page under Hot Topics, Plant Pest Home Page, and the Plant Pathogens Home page.

- ◆ Plant Pest Home Page: <http://www.aphis.usda.gov/ppq/permits/plantpest/index.html>

If the importing country requires an additional declaration referring to the presence or absence of a pest, see [Official Verification and Additional Declaration](#) on page 2-1-17.

TABLE 4-4-4: Action to Take When Commodity Must be Free From Applicable Harmful Organisms

If after reviewing the supporting documents or after inspecting the commodity you determine that:	And freedom from applicable harmful organisms:	Then:
Clear evidence exists that the commodity is free from listed harmful organisms (e.g., laboratory tests or field inspection results)		REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or go to <i>Steps to Certify</i> , Refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines. on page 4-5-3 to inspect the commodity
No clear evidence exists that the commodity is free from listed harmful organisms	Can be met (e.g., testing, field inspection results)	1. ALLOW exporter to provide evidence of freedom or 2. INSPECT, test, etc. the commodity to ensure freedom from harmful organisms (if practical) 3. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or go to <i>Steps to Certify</i> , Refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines. on page 4-5-3 to inspect the commodity
	Cannot be met	REFUSE to issue PPQ Form 577

4. Does the Commodity Have to Originate from an “Area” or “Production Area” Free from a Pest or Pathogen?

A country may require that a commodity originate from an “area” or a “production area” free from specific pests. In order to qualify for this requirement “freedom” must be demonstrated by scientific evidence.

Area freedom or Pest Free Areas refers to an officially defined country, part of a country or all or parts of several countries in which a specific pest does not occur and that this condition is being officially maintained.

Pest free place of production or Pest free production site refers to a place of production or a defined portion of that production area in which a specific pest does not occur and that this condition is being officially maintained.

Any determination that a commodity meets “area freedom” or “production area freedom” must meet the conditions specified in the following International Plant Protection Convention (IPPC) International Standards for Phytosanitary Measures (ISPMs).

The following ISPMs outline the requirements to meet “area freedom” or “production area freedom”

- ◆ ISPM # 04: Requirements for the establishment of Pest Free Areas.
- ◆ ISPM # 08: Determination of pest status in an area
- ◆ ISPM # 10: Requirements for the establishment of pest free places of production and pest free production sites

A country may state that a commodity is prohibited from:

- ◆ areas in which a specific pest occurs (they don’t specify the area)
- ◆ an area that **they** consider infected/infested with a pest

Conversely, some countries may specify the areas in the United States that they recognize as free from a specific pest, but not always. If EXCERPT does not specify which areas of the U.S. are considered free of a pest the ACO must make that determination before deciding whether or not a commodity is prohibited.

For guidance and clarification on this topic, follow the chain of communication listed in [Table 2-1-1 on page 2-1-13](#).

The following resources may be used to determine the status of a pest in the U.S. and the procedure for ensuring a commodity is free of a specific pest:

- ◆ EXCERPT: search EXCERPT using the *Keyword Search of Export Summaries*.
- ◆ Area identifiers, PPQ
- ◆ Crop Protection Compendium (CABI) at:

<http://www.cabi.org/compendia/cpc/>

If you do not have the user name and password contact your Export Certification Specialist. It is important to understand that the information in CABI is based on voluntary reports; if CABI does not list a pest as occurring in the US it may mean that no one has sent a report to CABI.

- ◆ Export Certification Specialists (ECS)
- ◆ National Agricultural Pest Information System (NAPIS): for pests listed in EXCERPT and pests listed in NAPIS, EXCERPT will provide a direct link to the appropriate information. The absence of data on a particular pest is only an indication that a state or states have not sent in a report on the pest.
- ◆ State or county plant health regulatory personnel
- ◆ Biological and Technical Services, PPQ - Riverdale through your ECS
- ◆ Cooperative Extension Services
- ◆ Universities
- ◆ The Widely Prevalent Plant Pathogenic Organisms Website is now available. The direct link is located at: <http://www.aphis.usda.gov/ppq/permits/plantpest/wpp/index.html>



This site can also be accessed from the PPQ Home Page under Hot Topics, Plant Pest Home Page, and the Plant Pathogens Home page.

- ◆ Plant Pest Home Page: <http://www.aphis.usda.gov/ppq/permits/plantpest/index.html>

If the importing country requires an additional declaration referring to the presence or absence of a pest, see ***Official Verification and Additional Declaration*** on page 2-1-17.

Refer to ***Table 4-4-5*** on page 4-4-9.

TABLE 4-4-5: Action to Take When Commodity is Prohibited from Areas Infected or Infested with a Specific Pest

If:	And:	And:	Then:
Country prohibits commodity from specific areas they consider infected or infested		Originated from specified area	REFUSE to issue a PC
		Does not originate from infected or infested specified area	Document origin
		Does not originate from specified area, but, the pest of concern occurs in the area of origin	1. Do not certify 2. Contact Export Services
Country does not specify areas they consider infected or infested	You can determine status of pest in place of origin	Originated from area infected or infested with pest	REFUSE to issue a PC
		Does not originate from an area infected or infested with pest	Document origin and pest status findings
	You cannot determine status of pest in place of origin		REFUSE to issue a PC

5. Does the Commodity Require a Growing Season Inspection?



Requirements for growing season inspections cannot be provided for all types of commodities. Grain and wood are examples of two commodities for which growing season inspections can not be conducted.

Growing season inspections can be conducted by:

- ◆ ACOs who have been trained in conducting field inspections
- ◆ Agents: individuals who meet the eligibility requirements set forth in 7CFRSec. 353.6, and are designated by the APHIS to conduct phytosanitary field inspections of seed crops to serve as a basis for the issuance of phytosanitary certificates. Agents may conduct phytosanitary field inspections of seed crops in cooperation with and on behalf of State plant health regulatory agencies that elect to use agents and maintain a Memorandum of Understanding (MOU) with the APHIS. The MOU must state that agents will be used in accordance with the regulations.
- ◆ Employees of a State plant protection agency who are authorized by APHIS. Employees of a State plant health protection agency who are not agents may perform field inspections only under the supervision of ACO.
- ◆ Accredited non-governmental entities

Exporters must present documentation that the required growing season inspection was conducted by an authorized person. If the exporter does not have the documentation or a growing season inspection was not conducted do not issue a certificate.

6. Is There a Specific Time Period When the Commodity Is Permitted to Enter the Importing Country?

ACOs must advise the exporters about a country's restrictions on when a commodity may be imported. If it appears that the declared date of exportation on the PPQ 572 will result in the consignment arriving during prohibited time periods do not issue a certificate unless the exporter adjusts the date of exportation.



Exporters should provide documentation indicating that the commodity will be imported during the allowed time period.

7. Does the Commodity Require Treatment or Was a Treatment Conducted?



Treatments do not preclude or substitute for a phytosanitary inspection.


Section 18 treatments **must** be monitored by Federal ACOs (per USDA-APHIS-PPQ Center for Plant Health Science and Technology (CPHST)).

ACOs may include a quarantine treatment on a certificate **only** when one of the following occurs:

- ◆ Fumigation treatment performed following procedures specified in the USDA-APHIS-PPQ *Treatment Manual* and monitored or supervised by a Federal, State, or county plant quarantine official
- ◆ In the following two cases, treatments do not have to be officially monitored if the treatment was conducted by a licensed pest control operator who is **not** routinely involved in regulatory treatments **and NO** other option was available:
 - ❖ Notarized letter attesting to a fumigation treatment performed by a licensed pest control operator (certified for the type of treatment performed) or
 - ❖ A compliance agreement for fumigation treatment in a chamber that followed the procedures specified in the USDA-APHIS-PPQ *Treatment Manual*, which is presented to the ACO for those occasions when a treatment is **not** monitored by a Federal, State, or county plant quarantine official
- ◆ Fumigation treatment indicated on seed labels which was officially monitored by State regulatory personnel to ensure EPA compliance **NOTE:** Treatments listed on foreign seed labels **cannot** be attested on a re-export phytosanitary certificate since a U.S. plant quarantine official did **not** monitor the treatment in the foreign country)
- ◆ Treatments conducted by the Federal Grain Inspection Service (FGIS) are acceptable to put on a phytosanitary certificate as long as the treatment is indicated on an acceptable FGIS certificate. See **Step 2: Determine if the Exporter Has an Acceptable Inspection Certificate That Would Preclude an Additional Inspection** on page 4-5-4 and Table D-1-1 on page D-1-1.


Begin at [Table 4-4-6 on page 4-4-12](#) to take the correct action.

TABLE 4-4-6: Action to Take When Commodity Requires Treatment

If:	And the exporter is:	Then:
An acceptable treatment was conducted and was monitored by a Federal, State, or county plant quarantine official		<ol style="list-style-type: none"> 1. RECORD details of all acceptable treatments on PC 2. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or refer to Figure 4-5-1 on page-4-5-3 for a list of the main inspection steps followed by detailed guidelines on how to inspect the commodity
No acceptable treatment was conducted or the treatment was not monitored by a Federal, State, or county plant quarantine official	Not willing to arrange for treatment	REFUSE to issue PC
	Willing to arrange for acceptable treatment which will be monitored by a Federal, State, or county plant quarantine official	<ol style="list-style-type: none"> 1. MONITOR treatment 2. RECORD details of all treatments on PC 3. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or refer Figure 4-5-1 on page-4-5-3 for a list of the main inspection steps followed by detailed guidelines on how to inspect the commodity

Treatments that are not required by the importing country or are not in response to the finding of a quarantine pest (non-phytosanitary treatment) may be included on the PC at the exporter's request, if the requirements for including a treatment on a PC have been met. It is not mandatory to include these treatments on the PC. Refer to [Table 4-4-7 on page 4-4-13](#).

TABLE 4-4-7: Action to Take If Exporter Requests Non-phytosanitary Treatment to Be Included on PC

If commodity was treated and:	And the exporter:	Then:
The treatment was acceptable and was monitored by a Federal, State, or county plant quarantine official		<ol style="list-style-type: none"> 1. If exporter requests, RECORD details of all treatments on PC 2. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines on how to inspect the commodity
The treatment is not acceptable or was not monitored by a Federal, State, or county plant quarantine official	Wants the shipment retreated and treatment included on PC	<ol style="list-style-type: none"> 1. MONITOR the treatment 2. RECORD details of all treatments on PC 3. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines on how to inspect the commodity
	Does not want the shipment retreated	<ol style="list-style-type: none"> 1. Refuse to include treatment details on the PC 2. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines on how to inspect the commodity

8. Is an Official Verification or Additional Declaration Required?

An important requirement that must be met prior to a PC being issued is that the ACO signing the PC officially verifies that all the phytosanitary requirements of the importing country have been met. Official verification (OV) means that the phytosanitary condition of the consignment was confirmed by an official of the National Plant Protection Organization (NPPO) of the US. OVs **CANNOT** be stated on the PC unless the importing country specifically states that an additional declaration is required.

Exception: Treatments required by an importing country must always be included in the Treatment section of the phytosanitary certificate. Including the treatment on a PC means that the ACO officially verified that the treatment was conducted.

The definition of an additional declaration (AD) is “A statement that is required by an importing country to be entered on a Phytosanitary Certificate and which provides specific additional information on a consignment in relation to regulated pests.” [FAO, 1990; revised ICPM, 2005]. Basically, an additional declaration (AD) is an official verification (OV) that is written on the phytosanitary certificate (PC).

Refer to [Official Verification and Additional Declaration](#) on [page 2-1-17](#) for additional guidance on attachments, listing the import permit (IP) number or that an IP was not presented, etc.

Prohibited Additional Declarations and Official Verifications

There are instances when a country will require an additional declaration (AD) or official verification (OV) that is against USDA-APHIS-PPQ policy. If an Import permit or other type of official communication is presented requiring an AD or OV that is prohibited **do not** provide certification of the commodity. Listed below are the most common types of prohibited ADs and OVs that may be required.

- ◆ When ACOs are certifying shipments of grain and a particular pathogen occurs in the United States ACOs **must never** attest to freedom or apparent freedom from plant disease causing organisms. USDA-APHIS-PPQ's policy prohibits making such ADs or OVs because inspecting parent plants during active growth in the field or analyzing selected grain samples in the laboratory is impractical. This prohibition applies regardless of whether the requirement is stated in an import permit, letter of contract or other type of official communication from the NPPO.

ACOs may attest to freedom or apparent freedom from plant disease causing organisms only if the pathogen is not known to occur in the United States (see example below).

EXAMPLE

*"Cephalosporium maydis and Peronosclerospora maydis are **not** known to occur in the United States."*

For bulk grain, ACOs may attest to an additional declaration against Karnal bunt of wheat (*Tilletia indica*), when that additional declaration is specifically listed in EXCERPT. This exception exists because of an ongoing national survey against Karnal bunt of wheat. For any other request to list an additional declaration against Karnal bunt of wheat in bulk grain, contact Export Services through channels. See [Table 2-1-1 on page 2-1-13](#) under *Overview of Export Program, Contact Protocol*.

- ◆ Advice number
- ◆ Aflatoxins or other mycotoxins
- ◆ Authorization number (**not** to be confused with a letter of authorization from the plant protection organization of the importing country)
- ◆ Fitness for human consumption
- ◆ For bulk shipments of grain, freedom from plant disease-causing organisms, when a pathogen occurs in the United States
- ◆ Freedom from animal diseases and statements about animal health concerns¹

¹ APHIS' policy is to **not** attest to animal health concerns on Federal plant export certificates. Refer exporters to USDA-APHIS-PPQ Veterinary Regulatory Services for letterhead statements to attest to the freedom from specific animal diseases. **Do not** attach these statements to Federal plant export certificates.


- ◆ Grade and/or quality
- ◆ Genetic composition and/or disease resistance²
- ◆ Intended use (such as for scientific purposes), unless, specifically stated in EXCERPT
- ◆ Import reference number
- ◆ Import tariff item number
- ◆ Letter of commitment number
- ◆ Letter of credit number
- ◆ Letter of credit requirements or other unofficial requests from buyers and sellers
- ◆ Levels of radioactivity, nuclear radiation, or radionuclides associated with a commodity³
- ◆ Official verification listed in an export summary or an import permit
- ◆ Pesticide or other chemical residues
- ◆ Pest status in a foreign country
- ◆ Purchase contract number
- ◆ References pertaining to a permit or a permit number issued by the Division of Management Authority for protected plant species
- ◆ References to artificially propagated or wild collected plants
- ◆ Any other requested statement that is **not** of a phytosanitary nature, such as economic permits, quantity or quality restrictions, or methods of packaging

When the commodity **must** comply with an AD use [Table 4-4-8 on page 4-4-16](#) to take the correct action.

2 For certifying genetic composition and/or disease resistance, refer exporters to GIPSA at 202-720-0252 or <<http://www.aphis.usda.gov/biotech>> for letterhead statements. **Do not** attach these statements to Federal plant export certificates.

3 For attesting to the absence of abnormal radioactive contaminant levels, refer exporters to Office of Food Safety and Technical Service, USDA/FAS OFSTS, Room 5545, South Agricultural Building, 14th and Independence Avenue, SW, Washington, DC 20250; phone 202-720-1301.


TABLE 4-4-8: Action to Take When Commodity Must Comply With an AD or OV

If the commodity:	And:	And requirements and conditions:	Then:
Must conform to an AD or OV	Requirements and conditions have been met		<ol style="list-style-type: none"> 1. Record applicable AD on PC 2. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or go to <i>Steps to Certify</i>, Refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines. on page 4-5-3 to inspect the commodity
	No clear evidence exists that requirements and conditions have been met	Can be met	<ol style="list-style-type: none"> 1. ALLOW exporter to provide evidence that the requirements and conditions have been met 2. Record applicable AD on PC 3. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or go to <i>Steps to Certify</i>, Refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines. on page 4-5-3 to inspect the commodity
		Cannot be met	REFUSE to issue PC

9. Does the Foreign Country Limit the Import of the Commodity to Specified Ports?

Use [Table 4-4-9](#) to take the correct action.

TABLE 4-4-9: Action to Take When Commodity Is Limited to Enter Specific Ports

Is the commodity:	And the exporter has designated:	Then:
Limited to specified ports	Port other than specified in the export summary	<ol style="list-style-type: none"> 1. WARN the exporter that the shipment may be refused or delayed if entering a port other than specified in the export summary <div>  <p>Important</p> </div> <div> <p>Do not refuse to issue PC if this is the only requirement that is not met.</p> </div>
	One of the specified ports	<ol style="list-style-type: none"> 1. REVIEW Table 4-4-1 on page 4-4-2 for guidance on other common requirements or go to <i>Steps to Certify</i>, Refer to Figure 4-5-1 on page 4-5-3 for a list of the main inspection steps followed by detailed guidelines. on page 4-5-3 to inspect the commodity